

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

COBBLESTONE WIRELESS, LLC, <i>Plaintiff,</i> v. CELLCO PARTNERSHIP d/b/a VERISON WIRELESS <i>Defendant.</i>	CASE No. 2:23-cv-00382-JRG-RSP (LEAD CASE) JURY TRIAL DEMANDED
COBBLESTONE WIRELESS, LLC, <i>Plaintiff,</i> AT&T SERVICES INC.; et al. <i>Defendants.</i>	Case No. 2:23-cv-00380-JRG-RSP (Member Case)
COBBLESTONE WIRELESS, LLC, <i>Plaintiff,</i> v. T-MOBILE USA, INC. <i>Defendant.</i>	Case No. 2:23-cv-00381-JRG-RSP (Member Case)

**PLAINTIFF COBBLESTONE WIRELESS, LLC'S RESPONSE TO DEFENDANT'S
CELLCO PARTNERSHIP DB/A VERISON WIRELESS'S COUNTERCLAIMS**

Plaintiff Cobblestone Wireless, LLC ("Cobblestone" or "Plaintiff") hereby answers the Counterclaims of Cellco Partnership d/b/a Verizon Wireless ("Verizon" or "Defendant"), as follows:

THE PARTIES

1. Admit.

2. Admit.

JURISDICTION AND VENUE

3. Admit that Defendant's counterclaims arise under the patent laws of the United States and that Defendant seeks certain declaratory relief. Deny that Defendant is entitled to any such relief. Deny any other allegations in this paragraph.

4. Admit that Defendant's counterclaims arise under the patent laws of the United States and that Defendant seeks certain declaratory relief. Deny that Defendant is entitled to any such relief. Deny any other allegations in this paragraph.

5. Admit.

6. Admit that venue is proper in this district. Deny any other allegations in this paragraph.

7. Admit that there is a case or controversy between the parties concerning alleged infringement of the Patents-in-Suit. Deny any other allegations in this paragraph.

8. Admit that there is a case or controversy between the parties concerning alleged infringement of the Patents-in-Suit. Deny any other allegations in this paragraph.

**FIRST COUNTERCLAIM DECLARATION OF NON-INFRINGEMENT OF U.S.
PATENT NO. 7,924,802**

9. Plaintiff realleges Paragraphs 1-8 as though fully set forth herein.

10. Admit that Plaintiff's allegations in its Complaint speak for themselves. Deny any other allegations in this paragraph.

11. Admit that Defendant denies that it infringes the '802 Patent. Deny any other allegations in this paragraph.

12. Denied.

13. Admit that Defendant denies that it infringes the '802 Patent. Deny any other allegations in this paragraph.

14. Admit that there is a case or controversy between the parties concerning alleged infringement of the '802 Patent. Deny any other allegations in this paragraph.

15. Denied.

16. Denied.

**SECOND COUNTERCLAIM DECLARATION OF INVALIDITY OF U.S.
PATENT NO. 7,924,802**

17. Plaintiff realleges Paragraphs 1-16 as though fully set forth herein.

18. Admit that Defendant alleges that the '802 Patent is invalid. Deny any other allegations in this paragraph.

19. Admit that there is a case or controversy between the parties concerning alleged validity of the '802 Patent. Deny any other allegations in this paragraph.

20. Admit that there is a case or controversy between the parties concerning alleged validity of the '802 Patent. Deny any other allegations in this paragraph.

PRAYER FOR RELIEF

WHEREFORE, Cobblestone prays for the following relief with respect to Defendant's counterclaims:

- A. A judgment in favor of Plaintiff on all counterclaims asserted by Defendants;
- B. An adjudication that Defendants are not entitled to any relief on its counterclaims, including, without limitation, any fine or damages; and
- C. A dismissal with prejudice of Defendants' counterclaims;

- D. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Defendant;
- E. Plaintiff's costs of suit against Defendants; and
- F. Any and all other relief as the Court may deem appropriate and just under the circumstances.

DEMAND FOR JURY TRIAL

Cobblestone demands a trial by jury on all issues so triable.

Dated: November 22, 2023

Respectfully submitted,

/s/ Reza Mirzaie

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CERTIFICATE OF SERVICE

The undersigned certifies that on November 22, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3)(A).

/s/ Reza Mirzaie

Reza Mirzaie